

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

In re:)
Johnny Darrell Lorick,) CASE #: 19-00252-JJG-13
Debtor.)

**DEBTOR'S MOTION TO SHORTEN NOTICE PERIOD, ESTABLISH OBJECTION
DEADLINE, AND SET AN EXPEDITED HEARING ON DEBTOR'S
MOTION TO SELL PROPERTY FREE AND CLEAR OF LIENS**

COMES NOW the Debtor, by undersigned counsel, and moves the Court for an Order shortening the Notice period, establishing an objection deadline, and setting an expedited hearing on Debtor's Motion to Sell Property Free and Clear of Liens. In support, the Debtor shows the Court as follows:

1. The Debtor filed a Voluntary Petition seeking relief pursuant to Chapter 13 of the U.S. Bankruptcy Code on January 15, 2019;

2. Contemporaneously herewith, Debtor has filed a *Motion to Sell Property Free and Clear of Liens*;

3. The Debtor is currently scheduled for closing December 21, 2020; however, Debtor is waiting on a signed Amendment to the Purchase Agreement from the buyer setting a new closing date of December 28, 2020 and the title company is wanting an Order on the Motion prior to that date for review;

4. The Debtor does not believe the relief sought in the Motion would be contested, as the Mortgage is being paid in full as are all allowed creditor claims;

5. Accordingly, the Debtor believes it is necessary under the circumstances for the Court to shorten the notice period on the Motion from 21 days, required by S.D. Ind. L.B.R. B-6004-2(d)(2), to 7 days;

6. The *Motion to Sell Property Free and Clear of Liens* has been served upon the United States Trustee and the Chapter 13 Trustee by e-mail transmission on

or about December 15, 2020 and is being served on all Creditors that filed a Claim in this case on the same date.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order shortening the notice period from 21 days to 7 days, establishing an objection deadline, and setting an expedited hearing on Debtor's Motion.

Date: 12/15/2020

Respectfully Submitted,



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